DOE/ID-10918
February 2002

Site 015 Track 1 Decision Documentation Package, OU 10-08

DECISION DOCUMENTATION PACKAGE
COVER SHEET

Prepared in accordance with

TRACK 1 SITES:
GUIDANCE FOR ASSESSING
LOW PROBABILITY HAZARD SITES
AT THE INEEL

Site Description:	Navy Debris in Canal Between TRA and NRF		
Site ID:	015	**Operable Unit:**	10-08
Waste Area Group:	10		

I. Summary – Physical Description of the Site:

Site 015 consists of scattered surface debris located .25 miles inside a large canal starting at the intersection of roads T3 and T14 off Lincoln Boulevard proceeding north. The closest INEEL facility is the Naval Reactor Facility, located approximately 2-1/2 miles northeast. Surface debris consists of weathered triangular and round metal objects and rubber rings.

This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste sites", a new site identification form was completed for this site. As part of the process, a field team wrote a site description and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates ar 3.) The GPS coordinate system is listed as NAD 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

Discussions with an INEEL Environmental Restoration Environment Safety, and Health Quality Assurance (ER ES&HQA) explosives expert revealed that the artifacts are the remains of propellant cans, resulting from U.S. Navy testing during and post-World War II. The objects were determined to be inert, are not considered hazardous constituents, and as such, pose no risk to human health or the environment. INEEL Cultural Resources reviewed photographs and site investigations and verified the nature and age of the artifacts.

There is no visual evidence of hazardous constituents, nor evidence that waste has recently been disposed of at this site. There is no evidence of disturbed vegetation, stained or discolored soil, or odors. The groundcover is minimal, which is indicative of a dry canal bed, due to the amount of rocks, lack of nutrients, and compacted soil.

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site, nor is there empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews, historical research, and photographs revealed no evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 015 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility of contaminant levels at this site being above risk-based limits is remote. Field investigations and visual observations of the debris and surface soil indicated no evidence of hazardous constituents. If hazardous materials and wastes were placed into this area, evidence such as stained soil, odors, loss of vegetation, fibrous materials, or other indications of contamination would be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides or other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY – Other Decision Drivers:

No other decision drivers are apparent for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews, historical knowledge of this area, and photographs indicate it highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located in a remote, abandoned area with no viable pathways or receptors. The NRF is the closest facility located approximately 2-1/2 miles north. There is nothing present at this site that would indicate evidence of contaminant migration, or historical or threatened release of hazardous substances, pollutants or contaminants, and, as such poses no potential risk to human health or the environment.

Signatures:	**# Pages:** 16	**Date:** July 30, 2001
Prepared By:	**DOE WAG Manager:**	
Approved By:	**Independent Review:**	

DECISION STATEMENT
(DOE RPM)

Date Received: 5/16/05

Disposition:

Site 015, OU 10-08

The abandoned site is an old homestead site which requires no further action and no institutional control.

Date: 5/19/05	**# Pages:**
Name: Kathleen S Hain	**Signature:**

DECISION STATEMENT
(EPA RPM)

Date Received: May 8, 2002 Site ID15 OU 10-08

Disposition:

Old abandoned site suspected to contain propellant cans from Naval Testing prior to INEEL occupation. Site is located between TRA & NRF. The debris is claimed to be inert based on interviews? It is claimed that no hazardous substances present but no process knowledge description is provided. It is also unclear if contamination/debris extends below grade. The proposed resolution of EPA's previous comment is that controls are in place. It should be remembered that the baseline risk assessment under the NCP does not include such controls in identifying risk. The proposed resolution is incorrect in this and in its assumptions of prior Agency agreement. It is suggested that the author refamiliarize themself with the FFA/CO & NCP. If the material is inert then it could be disturbed to allow surface geophysics to confirm that debris is limited to surface. This can be done either in support of a Track I or as part of a Track II investigation

Date: 10/15/02	**# Pages:** 1
Name: Wayne Pierre	**Signature:**

DECISION STATEMENT
(EPA RPM)

Date Received: 8-22-05 Site 015

Disposition:

EPA concurs that this site meets the definition of no further action under CERCLA but believes ~~(DS)~~ institutional controls should be ~~enforced as~~ part of the site wide ordnance IC program.

Date: 8-22-05	# Pages: 1
Name: Dennis Faulk	Signature:

DECISION STATEMENT
(IDEQ RPM)

Date Received: May 8, 2002

Disposition:

Site 015

Site 015 is located inside a large, abandoned canal about 2.5 miles southwest of NRF. The debris consists of weathered triangular and round metal objects and rubber rings. INEEL Cultural Resources reviewed photographs ~~and site investigations~~ verified the nature of the debris and age; the INEEL explosives expert identified the debris in the canal as remains of propellant cans that were used during and post World War II. The debris is identified as inert and is not considered hazardous.

EPA reviewed the initial submittal of this Track1 and commented that ordnance may be present below the surface and insufficient information was presented to make a decision on this Track 1. DOE notes metal fragmentation and craters that would suggest the presence of ordnance are absent from the site. The site does fall within the boundary of the Naval Gun Range firing fan.

The firing fan will be subject to an ordnance survey as part of the OU 10-04 ROD and institutional controls are in place. The State therefore recommends the debris/site identified in this Track 1 warrants a No Further Action.

Date: August 10, 2004	**# Pages:**
Name: Daryl E. Koch	**Signature:** Daryl E. Koch

PROCESS/WASTE WORKSHEET

SITE ID: 015 **PROCESS:** Navy Debris in Canal Between TRA and NRF

WASTE: Surface Debris related to U.S. Navy testing operations

Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Scattered debris likely resulting from Naval testing	Surface debris resulting from testing of naval propellants by the Navy during and post-WWII.	**Artifact:** Surface Debris **Location:** Scattered debris is littered along approximately .25 miles of a large canal starting at the intersection of roads T3 and T14 off Lincoln Boulevard and proceeding north. **Description:** Small triangular, round metal shapes and rubber rings.

CONTAMINANT WORKSHEET

SITE ID: 015 **PROCESS:** Navy Debris in Canal Between TRA and NRF

WASTE: Surface debris related to Naval testing operations

Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (high/med/ low)	Col 9 Overall Reliability (high/med/ low)
None	Soil	None	Not Applicable	Low	High

Question 1. What are the waste generation processes, locations, and dates of operation associated with this site?

Block 1 Answer:

Site 015 consists of surface debris scattered for a distance of approximately .25 miles inside a large canal. The site is located at the intersection of roads T3 and T14 off Lincoln Boulevard proceeding north. NRF is the closest facility, located 2 1/2 miles northeast.

The debris resulted from U.S. Navy testing operations during and post-WWII, and consists of triangular and round metal shapes and rubber rings.

Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low
Explain the reasoning behind this evaluation. (check one)

Interviews with INEEL Cultural Resources and ER ESH&QA personnel reveal that Site 015 consists of surface debris that is old, weathered, inert, contains no hazardous constituents, and poses no potential risk.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No
If so, describe the confirmation. (check one)

Interviews, site investigations, and historical research confirm the nature and age of artifacts. Photographs confirm the types of debris and conditions at the site.

Block 4 Sources of Information (check appropriate box(es) & source number from reference list)

No Available Information	☐	**Analytical Data**	☐
Anecdotal	☒ 2,5,6	**Documentation about Data**	☐
Historical Process Data	☐	**Disposal Data**	☐
Current Process Data	☐	**QA Data**	☐
Photographs	☒ 3	**Safety Analysis Report**	☐
Engineering/Site Drawings	☐	**D&D Report**	☐
Unusual Occurrence Report	☐	**Initial Assessment**	☒ 4
Summary Documents	☐	**Well Data**	☐
Facility SOPs	☐	**Construction Data**	☐
Other	☐		

Question 2. What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?

Block 1 Answer:

Site 015 consists of surface debris scattered for a distance of approximately .25 miles inside a large canal. The site is located at the intersection of roads T3 and T14 off Lincoln Boulevard proceeding north. NRF is the closest facility, located 2-1/2 miles north.

The debris resulted from U.S. Navy testing operations during and post-WWII, and consists of triangular and round metal shapes and rubber rings. The debris was abandoned in the canal following testing activities.

Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low
Explain the reasoning behind this evaluation. (check one)

Interviews with INEEL Cultural Resources and ER ESH&QA personnel reveal that Site 015 consists of surface debris that is old, weathered, inert, contains no hazardous constituents, and poses no potential risk.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No
If so, describe the confirmation. (check one)

Interviews, site investigations, and historical research confirm the nature and age of artifacts. Photographs confirm the types of debris and conditions at the site.

Block 4 Sources of Information (check appropriate box(es) & source number from reference list)

No Available Information	☐	**Analytical Data**	☐
Anecdotal	☒ 2,5,6	**Documentation about Data**	☐
Historical Process Data	☐	**Disposal Data**	☐
Current Process Data	☐	**QA Data**	☐
Photographs	☒ 3	**Safety Analysis Report**	☐
Engineering/Site Drawings	☐	**D&D Report**	☐
Unusual Occurrence Report	☐	**Initial Assessment**	☒ 4
Summary Documents	☐	**Well Data**	☐
Facility SOPs	☐	**Construction Data**	☐
Other	☐		

Question 3. Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.

Block 1 Answer:

There is no evidence that a source exists at Site 015. The debris resulted from U.S. Navy testing operations during and post-WWII, and consists of triangular and round metal shapes and rubber rings. The debris was abandoned in the canal following testing activities. There is no evidence of hazardous constituents, disturbed vegetation, stained or discolored soil, or odors.

Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low
Explain the reasoning behind this evaluation. (check one)

Site investigations conducted by an INEEL explosives expert confirmed that the debris was related to Naval testing operations and was left in place during the late 1940s-1950s timeframe. Site investigations revealed no evidence of hazardous constituents present at the site.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No
If so, describe the confirmation. (check one)

Interviews, site investigations, and historical research confirm the nature and age of the debris. Photographs confirm the type of debris and current conditions at the site.

Block 4 Sources of Information (check appropriate box(es) & source number from reference list)

No Available Information	☐	Analytical Data	☐
Anecdotal	☒ 2,5,6	Documentation about Data	☐
Historical Process Data	☐	Disposal Data	☐
Current Process Data	☐	QA Data	☐
Photographs	☒ 3	Safety Analysis Report	☐
Engineering/Site Drawings	☐	D&D Report	☐
Unusual Occurrence Report	☐	Initial Assessment	☒ 4
Summary Documents	☒ 1	Well Data	☐
Facility SOPs	☐	Construction Data	☐
Other	☐		

Question 4. Is there empirical, circumstantial, or other evidence of migration? If so, what is it?

Block 1 Answer:

There is no evidence of migration at Site 015. Site investigations reveal no visual evidence of hazardous constituents, disturbed, stained or discolored soil areas, or odors. Vegetation is minimal, but typical considering the location inside a dry canal bed. Interviews and site investigations confirm that the debris is inert, resulted from Naval testing operations, and poses no potential risk.

Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low
Explain the reasoning behind this evaluation. (check one)

Site inspections and photographs of the site show no staining or discolored soil, and that vegetation is well established; therefore giving no indication of disturbance or the presence of contaminants.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No
If so, describe the confirmation. (check one)

This information was confirmed through site inspections and photographs.

Block 4 Sources of Information (check appropriate box(es) & source number from reference list)

No Available Information	☐	Analytical Data	☐
Anecdotal	☒ 2,5,6	Documentation about Data	☐
Historical Process Data	☐	Disposal Data	☐
Current Process Data	☐	QA Data	☐
Photographs	☒ 3	Safety Analysis Report	☐
Engineering/Site Drawings	☐	D&D Report	☐
Unusual Occurrence Report	☐	Initial Assessment	☒ 4
Summary Documents	☒ 1	Well Data	☐
Facility SOPs	☐	Construction Data	☐
Other	☐		

Question 5. **Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?**

Block 1 **Answer:**

There is no expected pattern of potential contamination because there is no evidence of hazardous substances at this site. There is no evidence of stained or discolored soil in the area, odors, or visual evidence of disturbed vegetation. The debris resulted from Naval testing of propellants. The pattern of hazardous constituents (organics, metals, radio nuclides, etc.) cannot be estimated without further field screening or soil sampling; however, because of the nature, age and weathered condition of the debris it is highly unlikely that contaminants would be present at levels above risk-based limits.

Block 2 **How reliable are the information sources?** ☒ **High** ☐ **Med** ☐ **Low**
Explain the reasoning behind this evaluation. **(check one)**

This information was obtained from a 1994 environmental baseline assessment, subsequent site investigation, and interviews with an INEEL explosives expert and Cultural Resources personnel. Photographs indicate that the soil is not stained or discolored. Vegetation near the debris is minimal, but typical for a dry canal bed.

Block 3 **Has this INFORMATION been confirmed?** ☒ **Yes** ☐ **No**
If so, describe the confirmation. **(check one)**

The information was confirmed through site inspections, interviews and photographs.

Block 4 **Sources of Information** **(check appropriate box(es) & source number from reference list)**

No Available Information	☐	**Analytical Data**	☐
Anecdotal	☒ 2,5,6	**Documentation about Data**	☐
Historical Process Data	☐	**Disposal Data**	☐
Current Process Data	☐	**QA Data**	☐
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Unusual Occurrence Report	☐	**Initial Assessment**	☒ 4
Summary Documents	☒ 1	**Well Data**	☐
Facility SOPs	☐	**Construction Data**	☐
Other	☐		

Question 6. **Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.**

Block 1 **Answer:**

Site investigations and photographs indicate that Site 015 consists of triangular and round metal shapes and rubber rings scattered for a distance of .25 mile inside a dry canal. There is no evidence of a source at this site or contaminated region to estimate because there is no evidence of hazardous or radioactive materials. Interviews with an INEEL explosives expert reveal that the debris is inert, contains no hazardous constituents, and, as such poses no risk to human health or the environment.

Block 2 **How reliable are the information sources?** ☒ **High** ☐ **Med** ☐ **Low**
Explain the reasoning behind this evaluation. **(check one)**

This information was obtained from an environmental baseline assessment, subsequent site investigation, and interviews conducted with an INEEL explosives expert and Cultural Resource personnel. The interviews and investigations gave no indication that the debris contains anything that would pose a potential risk.

Block 3 **Has this INFORMATION been confirmed?** ☒ **Yes** ☐ **No**
If so, describe the confirmation. **(check one)**

This information was confirmed through site inspections, interviews, photographs and Cultural Resource historical research.

Block 4 **Sources of Information** **(check appropriate box(es) & source number from reference list)**

No Available Information	☐	**Analytical Data**	☐
Anecdotal	☒ 2,5,6	**Documentation about Data**	☐
Historical Process Data	☐	**Disposal Data**	☐
Current Process Data	☐	**QA Data**	☐
Photographs	☒ 3	**Safety Analysis Report**	☐
Engineering/Site Drawings	☐	**D&D Report**	☐
Unusual Occurrence Report	☐	**Initial Assessment**	☒ 4
Summary Documents	☒ 1	**Well Data**	☐
Facility SOPs	☐	**Construction Data**	☐
Other	☐		

Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.

Block 1 Answer:

The estimated quantity of hazardous substances/constituents at this site is near zero, because there is no evidence of any hazardous or radioactive materials present at Site 015. This site consists of weathered, inert, industrial debris that resulted from Navy testing of propellant cans during and post-WW II. There is no evidence of hazardous constituents that might pose a risk to human health or the environment.

Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low
Explain the reasoning behind this evaluation. (check one)

This information was obtained from an environmental baseline assessment, subsequent site investigation, and interviews conducted with an INEEL explosives expert and Cultural Resource personnel. The interviews and investigations gave no indication that the debris contains anything that would pose a potential risk. Photographs show that vegetation is minimal, but typical for a dry canal bed.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No
If so, describe the confirmation. (check one)

This information was confirmed through site inspections, interviews, and photographs.

Block 4 Sources of Information (check appropriate box(es) & source number from reference list)

No Available Information	☐	**Analytical Data**	☐
Anecdotal	☒ 2,5,6	**Documentation about Data**	☐
Historical Process Data	☐	**Disposal Data**	☐
Current Process Data	☐	**QA Data**	☐
Photographs	☒ 3	**Safety Analysis Report**	☐
Engineering/Site Drawings	☐	**D&D Report**	☐
Unusual Occurrence Report	☐	**Initial Assessment**	☒ 4
Summary Documents	☒ 1	**Well Data**	☐
Facility SOPs	☐	**Construction Data**	☐
Other	☐		

Question 8. Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.

Block 1 Answer:

There is no evidence that a hazardous substance or constituent is present at levels that require action at this site. An INEEL ER ES&HQA explosives expert confirmed that the debris was inert, contained no hazardous constituents, and resulted from Navy testing activities in the late 1940s - 1950s. There is nothing to indicate that hazardous substances are present at the site.

Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low
Explain the reasoning behind this evaluation. (check one)

This evaluation is based on interviews, site visitations, and photographs of the area. There is no evidence of hazardous constituents. This site shows no soil staining or discoloration. Vegetation is minimal but typical for a dry canal bed.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No
If so, describe the confirmation. (check one)

This information was confirmed through site inspections, INEEL Cultural Resource historical research, interviews and photographs.

Block 4 Sources of Information (check appropriate box(es) & source number from reference list)

No Available Information	☐	**Analytical Data**	☐
Anecdotal	☒ 2,5,6	**Documentation about Data**	☐
Historical Process Data	☐	**Disposal Data**	☐
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Unusual Occurrence Report	☐	**Initial Assessment**	☒ 4
Summary Documents	☒ 1	**Well Data**	☐
Facility SOPs	☐	**Construction Data**	☐
Other	☐		

REFERENCES

1. DOE, 1992, "Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID- 10390"

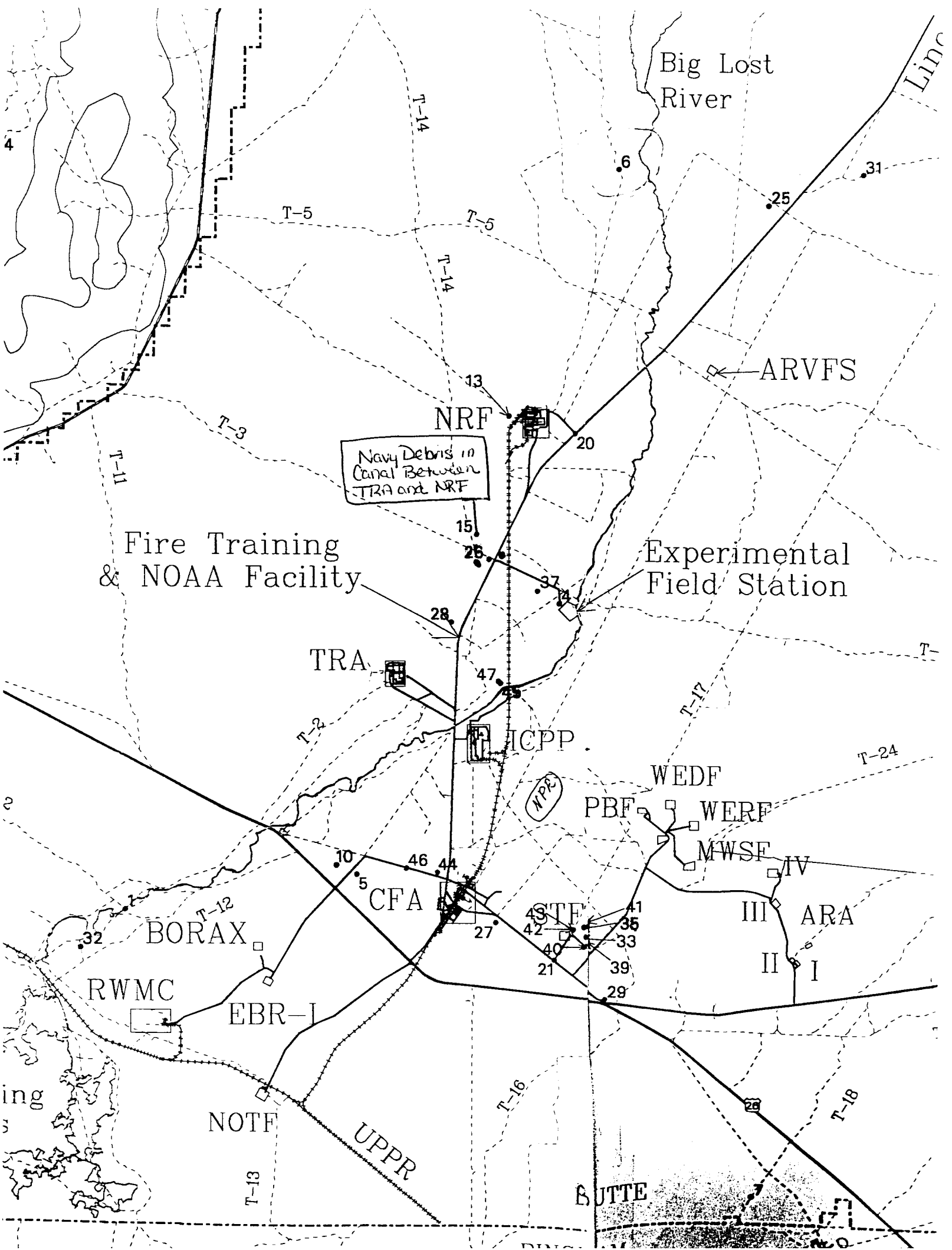
2. Interview with Hanceford Clayton, INEEL ESH&QA explosives expert, April 11, 2001.

3. Photographs of Site 015: 99-465-1-21, 99-465-1-22.

4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.

5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.

6. Interview with an Environmental Baseline Team Member, February 6-7, 2001.


Big Lost River
T-14
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T-5
T-14
T-3
T-11
ARVFS
NRF
Navy Debris in Canal Between TRA and NRF
Fire Training & NOAA Facility
Experimental Field Station
TRA
ICPP
T-2
T-17
T-24
WEDF
PBF
WERF
MWSF
IV
III
ARA
II
I
CFA
STF
BORAX
RWMC
EBR-I
NOTF
UPPR
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Attachment A

Photographs of Site #015

Site: 015, Navy Debris in Canal Between TRA and NRF
(99-465-1-21)

Site: 015, Navy Debris in Canal Between TRA and NRF
(99-465-1-22)

Attachment B

Supporting Information for Site #015

435.36
04/14/99
Rev. 03

NEW SITE IDENTIFICATION

Part A – To Be Completed By Observer

1. Person Initiating Report: Jacob Harris	Phone: 526-1877
Contractor WAG Manager: Douglas Burns	Phone: 526-4324

2. Site Title: 015, Navy Debris in Canal Between TRA and NRF

3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.

Scattered debris is littered along approximately .25 miles of a large canal starting at the intersection of T3 and T14 and proceeding north. During the July 1999 site visit, the surface debris observed included triangular metal shapes, round metal shapes, and rubber rings. Debris was determined to be the remains of Navy propellant cans by Hance Clayton, Er Esh&Qa. The GPS coordinates for this site are ' The reference number for this site is 015 and can be found on the summary map as provided.

Part B – To Be Completed By Contractor WAG Manager

4. Recommendation:

☒ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO.
WAG: Operable Unit:

☐ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.

5. Basis for the recommendation:

The conditions that exist at this site indicate the potential for an inactive waste site according to Section 2 of MCP-3448 Reporting or Disturbance of Suspected Inactive Waste Sites.

The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: _____ Signature: _____ Date: _____

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD **2/28/02**

DOCUMENT TITLE/DESCRIPTION: _____

DATE: March 11, 2002 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
Site 015			The site appears related to the 10-04 UXO. It is not known if ordnance may be present below the surface as no surface geophysical investigation information is presented. The site is also within the INEEL facility corridor. Insufficient information is available to make a decision on this Track 1.	The Agencies previously agreed that additional data were not necessary for Site 015. It is accurate to say we do not know if ordnance is present below the surface and UXO could be located almost anywhere on the INEEL. There are no apparent metal fragments or craters nearby, and there is no historical or process knowledge to suggest a likelihood of UXO at this site. Without reason to suspect the presence of buried ordnance we do not feel it is consistent with the overall Track 1 approach to perform additional investigations at Site 015. As mentioned in the comment, Site 015 is within the INEEL facility corridor. This is an important point, because controls are already in place inside the facility corridor that make UXO surveys mandatory before an excavation or disturbance can occur. In addition, the site is within the Naval Gun Range firing fan and will most likely be surveyed under the same remedial/geophysical activities as the rest of the Gun Range ordnance site and will have institutional controls.